

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

**MICHAEL WRAY THOMPSON
CYNTHIA MAE THOMPSON**

Debtors

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CHAPTER 13

No. 19-16808 amc

DEBTOR'S RESPONSE TO THE MOTION OF FREEDOM MORTGAGE

CORPORATION FOR RELIEF FROM THE AUTOMATIC STAY

COMES NOW, Michael Wray Thompson and Cynthia Thompson, Debtors and Respondents, through counsel of record, Michele Perez Capilato, Esquire, and submits the following in response to the Motion for Relief from the Automatic Stay filed herein:

1-3. DENIED. The averments contained in these Paragraphs consist of mischaracterizations or summarizations of documents that speak for themselves and they are denied as no response is required.

4. DENIED.

5. DENIED. Debtors acknowledge briefly falling behind with post-petition mortgage payments due to Debtor Spouse's temporary loss of income due to the COVID-19 pandemic. However, Debtors believe they are now current through the July 2021 payment.

6-11. DENIED. The averments contained in these Paragraphs consist of mischaracterizations, summarizations of documents that speak for themselves or conclusions of law and they are denied as no response is required.

For the reasons set forth above, among others, and based on this Court's authority under the Bankruptcy Code, the Debtor prays that the motion be denied, and such other relief as is just and proper. The Debtor specifically reserves the right to supplement the answer at or prior to the hearing thereon.

July 27, 2021

Respectfully submitted,

Law Offices of Michele Perez Capilato

By: /s/ Michele Perez Capilato
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